

March XX, 2015

Mr. James Golden
Deputy Director for Operations
Virginia Department of Environmental Quality
629 East Main Street
PO Box 1105
Richmond, VA 23218

RE: Dominion Virginia Power Coal Ash Impoundments

Dear Mr. Golden:

As a follow-up to our February XX, 2015 [meeting](#), Dominion ~~Resources, Inc.~~ is providing additional detail on our future plans for managing wet coal ash ponds to comply with the requirements in the new federal *Disposal of Coal Combustion Residuals from Electric Utilities* rule (CCR rule). In the CCR rule, EPA addresses both ponds that are currently receiving CCRs (existing ponds) and ponds that no longer receive CCRs, but continue to store CCRs (inactive ponds). Dominion operates two former coal-fired electric generating facilities, Bremo Power Station and Possum Point Power Station that utilize inactive CCR ponds as defined in the CCR rule for low volume waste and facility wastewater management. ~~The inactive ponds at these two facilities are permitted under the Virginia Pollution Discharge Elimination System program.~~ The CCR rule authorizes an exemption of all other rule requirements if an inactive pond is closed under the requirements of the rule within 36 months of the rule being published in the Federal Register. It is Dominion's intent to comply with this section of the CCR rule and close our inactive ponds as described below.

The Bremo Power Station has three inactive ponds as defined in the CCR rule named East Pond, North Pond, and West Pond. Currently, only the North Pond and West Pond are actively receiving facility wastewaters. The East Pond does not receive facility wastewaters, but a portion of this pond remains wet from storm water and continues to store coal ash. Dominion's conceptual plan for the site is to remove the stored ash from the West Pond, reline the pond, and utilize it for facility non-CCR wastewater management. The ash from the West Pond is to be relocated to the North Pond to aid in its closure as fill material. The North Pond stored ash will be dewatered sufficient to support a designated cover system, capped, and closed. The East Pond

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requires earth movement to improve ~~its long-term slope stability~~ the slope of the pond berm and to dewater the eastern portion of the pond. The East Pond will capped and closed with a cover system consistent with the CCR rule requirements.

The Possum Point Power Station also has three inactive ponds as defined in the CCR rule named A-B-C Pond, D Pond, and E Pond. Currently only the D and E ponds actively receive facility wastewaters. The A-B-C Pond does not receive facility wastewaters, but a portion of this pond remains occasionally wet from storm water and continues to store coal ash. Dominion's conceptual plan for the site is to remove the stored ash from the E Pond, reline the pond, and utilize it for facility non-CCR wastewater management. The ash from the E Pond will be relocated to the D Pond to aid in its closure as fill material. The E Pond stored ash will be dewatered sufficient to support a designated cover system, capped, and closed. The A-B-C Pond requires earth movement to improve site drainage, and to dewater the low portions of the pond. The A-B-C Pond will capped and closed with a cover system consistent with the CCR rule requirements.

Comment [I1]: Or is it to remove a portion of the ash?

In addition to the above inactive ponds, Dominion is also performing engineering studies at the Chesterfield Power Station to develop an integrated ash management program for the conversion of the facility's ash management system from its current wet sluice to the Lower Pond to a dry ash management system. The studies include the installation of dry ash handling equipment and integration with current infrastructure, construction of the Reymet Road industrial landfill, closure of the Lower and Upper Ash Ponds, installation of additional wastewater treatment capacity, and construction of a new low volume wastewater management pond. These studies and subsequent actions incorporate considerations of both the CCR rule and the future *Effluent Limitation Guideline (ELG) for Steam Electric Generating Category* rule.

Do we need to include Clover Sludge Ponds? Let's draft it that way and then we can always delete. Also should we also mention the plans that we have already made them aware of to close the pond at Chesapeake?

We are interested in meeting with you to discuss these plans further and to come to an understanding regarding ~~state and public~~ requirements necessary to accomplish the above plans within the short time frame allotted by the EPA. If you have any questions, please call me at 804-273-2929.

Sincerely,

Mr. James Golden
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Cathy C. Taylor